OUR COMPLIANCE PROGRAM

PROCEDURES AND POLICIES RELATED TO THE CODE OF BUSINESS CONDUCT

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1. Message from the Group CEO

Our success depends on everyone's behaviour being in line with our core values of "good faith, boldness, and responsiveness."

In line with these values, the Group is rolling out a bold compliance program that addresses our challenges and will enable us to grow sustainably.

A set of rules has been added to our Code of Business Conduct. It must guide our decisions and behavior on a daily basis.

This approach is not new at Econocom. In 2024, we **accelerated the rollout of our compliance program**. We updated our **risk map**, which identifies risky situations and allows us to implement appropriate measures.

We have also strengthened our system by:

- Adapting **our rules** to regulatory requirements (gifts and invitations, conflicts of interest).
- Improving the **alert procedure** to take into account recent developments.
- Strengthening **the assessment of third parties** to protect ourselves against risks related to our business partners.
- Formalising a specific procedure for **our agents**, setting clear standards so that everyone acts with integrity and sets an example.
- Rolling out a regular **training program** to promote a culture of ethics throughout the Group, at all levels.

Our program will be regularly updated to respond to new challenges and enable us to safeguard all our activities in a context of growth. A team dedicated to compliance within the Group Legal Department is supporting us in rolling out the program. To this end, a Chief Compliance Officer has been appointed to oversee the rollout of our compliance program, in conjunction with the Ethics Committee.

Setting an example is essential: executives and managers have a duty to lead the way, and everyone must understand that ethics are demonstrated through concrete actions in the day-to-day conduct of our business.

Every employee, regardless of their role or position in the hierarchy, shares the **responsibility for respecting and promoting these rules.** Our reputation, our legal and financial security, and the trust placed in us by our customers, partners, and employees depend on it.

The entire Executive Committee, the members of the GMC, and I are counting on your commitment to bring these principles to life every day and to pass them on to your teams.



Angel Benguigui

2. Scope

This set of rules gives concrete expression to the Group's ethical and regulatory commitments. It supplements the Code of Conduct with operational guidelines linked to the 2024 risk map, which forms its basis.

It also provides practical tools for preventing risks and acting in accordance with our values.

These procedures and policies apply to:

- All Econocom divisions, departments, subsidiaries, agencies, and branches.
- Anyone acting for or on behalf of the Group, regardless of their status: executives, employees, agents, temporary workers, consultants, service providers and partners.

3. Roles and responsibilities

It is everyone's responsibility to know, understand, and apply the procedures.

Responsibilities for developing the compliance program are defined as follows:

- **Compliance Team:** develops and updates the compliance program. Supports teams in understanding the issues at stake.
- **Ethics Committee**: disseminates and ensures the proper application of policies and procedures; answers questions and manages alerts.
- **Local managers and executives**: promote an ethical culture, support implementation, and ensure compliance with policies within their scope.
- **Compliance Officers**: appointed within their scope of responsibility, they act as operational liaisons, ensuring that policies are disseminated and contributing to the development of an ethical culture.
- **All Econocom representatives**[1] :
    - Are familiar with the rules and associated training.
    - Apply policies and procedures, including those relating to third-party assessment and the agent procedure.
    - Report any actual or potential violations via the whistleblowing procedure.
    - Act with integrity and professionalism in all circumstances.

Compliance with these procedures and policies will be verified as part of internal control and internal audit work.

Any suggestions for improvements to these policies are encouraged and may be sent to the Group Ethics Committee at the following address: ethical.committee@econocom.com

[1]**Econocom representative:** any person acting on behalf of or for Econocom, regardless of their status or position within the organisation (corporate officers, employees, agents, interns, etc.).

4. Training

The Group organises initial and ongoing training sessions to:

- Promote a culture of ethics and compliance.
- Provide training on key procedures (third-party assessment, agent procedure, whistleblowing system, etc.).
- Ensure that everyone has the necessary knowledge to apply the rules, prevent and manage risky situations.

Awareness sessions are organised via e-learning: they are updated regularly, and each new employee must complete and validate them within four months of joining the company.

Face-to-face training sessions are organised and must be repeated every three years.

For new employees, these sessions must take place no later than one year after they start work.

Target audience for training

All Econocom managers and all employees exposed to risk are trained.

This includes, at a minimum:

- Corporate officers and senior managers.
- Operations managers.
- Functional directors.
- Employees responsible for negotiating and executing commercial contracts.
- Employees involved in negotiating purchases of suppliers or services of any kind.
- Employees responsible for or involved in responding to calls from tenders (national or international).
- Employees who may participate in meetings within professional associations.

Training monitoring

Training is monitored annually and reported to the Ethics Committee and Senior Management.

Each Area Director is responsible for monitoring quantitative indicators (number of people trained, etc.) and qualitative indicators (training feedback, knowledge tests).

5. What to do if in doubt?

If you have any doubts or questions about the application of procedures, you can contact:

- Your line manager,
- The Group Legal Department,
- The Ethics Committee at ethical.committee@econocom.com

In addition, the ethics alert procedure allows you to report any violation or risk of violation securily and confidentially. It guarantees the protection of whistleblowers and impartial treatment of reports.

6. Our commitment

By applying these rules:

- We preserve the integrity, reputation, and sustainability of the Group.
- We protect the Group and its stakeholders against legal, financial, and reputational risks.
- We promote sustainable and responsible development.

7. Penalties

Failure to comply with the rules set out in this document and in the Code of Conduct may result in:

- Internal **disciplinary sanctions**, up to and including dismissal.
- **Civil and criminal proceedings** when the facts constitute an offense.
  Econocom does not tolerate any breaches and takes firm action to protect its employees, customers, partners, and reputation.

APPENDIX 1 Body of rules and procedures associated with the Code of Conduct

The table below lists the procedures and policies related to the Code of Conduct. They are available on ONE LINK under the "Ethics" tab.

No.	Name of procedure	Purpose
100	Introduction and Group Commitment	Presents the general framework, responsibilities, and commitment of the CEO
101	Gifts and invitations procedure	Regulates the acceptance and offering of gifts and invitations, the use of gift vouchers, and the organization of events.
102	Patronage and sponsorship	Governs patronage and sponsorship activities.
103	Financial market integrity	Oversees information exchange practices and ensure protection against market abuse and insider dealing.
104	Ethics alert procedure	Set outs procedures for reporting concerns and protecting whistleblowers.
10	Internal investigation	Terms and conditions under which internal investigations may be conducted and are conducted.
105	Conflict of interest procedure	Prevents conflicts of interest and implements reporting procedures.
105.1	Recruitment of relatives	Regulates the recruitment of relatives to ensure there is no conflict of interest
106	Fair trading	Regulates our practices to ensure compliance with competition law.
107	Third-party evaluation procedure	Methodology for evaluating partners, suppliers, and customers
108	Anti-corruption checks in M&A transactions	Methodology for evaluating targets in M&A transactions
109	Agents Procedure	Governs contractual relationships with commercial agents and sets out our ethical standards.